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Michael McCarthy and The DreamTeam Group, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

**In re GALENA BIOPHARMA, INC.
SECURITIES LITIGATION**

Case No.: 3:14-cv-00367-SI

**STIPULATION AND [PROPOSED]
ORDER FOR BRIEFING SCHEDULE
OF DEFENDANTS
MICHAEL MCCARTHY AND
THE DREAMTEAM GROUP LLC**

WHEREAS, on October 31, 2014, Lead Plaintiffs Kisok Cho, Anthony Kim, Pantelis Lavidas and Joseph Buscema (“Lead Plaintiffs”) and Plaintiff Alan Theriault (collectively, the “Plaintiffs”) filed their Consolidated Class Action Complaint for Violations of the Federal Securities Laws (the “Complaint”) (Dkt. No. 59), naming as Defendants, among others Michael McCarthy and The DreamTeam Group LLC;

WHEREAS, on June 10, 2015, Defendants Michael McCarthy and The DreamTeam Group LLC filed their motion to dismiss (Dkt. No. 147);

WHEREAS, on August 5, 2015 the Court issued its Opinion and Order (Dkt. No. 149) granting in part and denying in part the Defendants’ motions to dismiss; and

WHEREAS, the Court’s August 5, 2015 Opinion and Order granted Plaintiffs leave to file an amended complaint within 28 days from the date of the Opinion and Order;

WHEREAS, Plaintiffs have represented to the Court that they do not intend to file an amended complaint;

WHEREAS, Plaintiffs and Defendants Lidingo Holdings, LLC and Kamila Bjorlin have entered into a stipulation that Defendants Lidingo Holdings, LLC and Kamila Bjorlin shall file and service their answer to the complaint by October 29, 2015;

WHEREAS, the Court has ordered that Defendants Lidingo Holdings, LLC and Kamila Bjorlin shall file and service their answer to the complaint by October 29, 2015 (Dkt. No. 151);

NOW THEREFORE, it is agreed, subject to the approval of the Court, that:

1. Plaintiffs will not file an amended complaint as against Defendants Michael McCarthy and The DreamTeam Group LLC;
2. Defendants Michael McCarthy and The DreamTeam Group LLC shall file and serve their Answer to the complaint on or before October 29, 2015.

SO STIPULATED:

Dated: October 6, 2015

/s/

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Attorneys for Defendants

Michael McCarthy and The DreamTeam Group, LLC

IT IS SO ORDERED:

DATED: October ___, 2015

The Hon. Michael H. Simon

United States District Judge

CERTIFICATE OF SERVICE

I certify that on October 6, 2015 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all counsel of record who have consented to electronic filing.

DATED: October 6, 2015

/s/ Ciaran P.A. Connelly
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